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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

UNITED STATES OF AMERICA

3:16-CR-00051-BR

v.

AMMON BUNDY, et al.,

Defendants.

**GOVERNMENT'S RENEWED
MOTION FOR
ORDER PERMITTING THE
GOVERNMENT TO FILE
UNDER SEAL AND *EX PARTE*
THE DECLARATION OF
AUSA PAMALA R. HOLSINGER
IN SUPPORT OF THE GOVERNMENT'S
OPPOSITION TO DEFENDANT'S
MOTION TO COMPEL PRODUCTION
OF THE INVESTIGATION OF FBI
USE OF FORCE AND COVER-UP
IN THE FINICUM SHOOTING**

The United States of America, by Billy J. Williams, United States Attorney for the
District of Oregon, through Ethan D. Knight, Geoffrey A. Barrow, Craig J. Gabriel,

Charles F. Gorder, Jr. and Pamala R. Holsinger, Assistant United States Attorneys (AUSAs), moves this Court for an order permitting the government to file under seal and *ex parte* AUSA Pamala R. Holsinger's Declaration.

The Declaration is intended to be filed *ex parte*, as authorized under Rule 16(d) of the Federal Rules of Criminal Procedure, in support of the government's Opposition to Defendants' Motion to Compel Production of the Investigation of FBI Use of Force and Cover-Up in the Finicum Shooting filed by Defendant Fry on behalf of all defendants (ECF No. 700). The Declaration provides details of an ongoing investigation by the United States Department of Justice, Office of Inspector General, and concerns matters occurring before the grand jury protected from disclosure by Rule 6(e) of the Federal Rules of Criminal Procedure. The Declaration more fully describes to the Court alone the nature of the material which is the subject of defendants' Motion to Compel and which the government contends should be denied from discovery as permitted by Rule 16(d).

Per Olson, attorney for Defendant David Fry, and on behalf of all other defendants, opposes this motion.

Dated this 23rd day of June 2016.

Respectfully submitted,

BILLY J. WILLIAMS
United States Attorney

s/ Charles F. Gorder, Jr.
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